



County of Yolo

HEALTH DEPARTMENT

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RE: Status Report

CUPA: Yolo County Environmental Health

Date of Evaluation: January 31 - February 1, 2006

State Evaluation Team:

Cal/EPA Team Leader: Kareem Taylor
DTSC Evaluator: Mark Pear
OES Evaluator: Brian Abeel
SWRCB Evaluator: Marcele Christofferson
OSFM Evaluator: Francis Mateo

Deficiencies and Corrective Actions Status Report

1. **Deficiency:** The CUPA is not inspecting all CalARP facilities subject to the surcharge on a triennial basis.

CUPA Corrective Action: Yolo County currently has 15 CalARP facilities. Since the last status report we have completed one additional CalARP facility inspection. Two inspections are currently scheduled for December 2006 and the remaining three inspections are being scheduled for January 2007.

2. **Deficiency:** The CUPA does not regularly evaluate the City of West Sacramento Fire Department and the County Agricultural Commissioner in their implementation of the CUPA Program.

CUPA Corrective Action: Included with this status report is a copy of the CUPA self audit which includes a brief audit of the PA and the Agriculture Department. Next years audit of the PA will be more formal, and the CUPA would appreciate guidance from CalEPA, such as a PA audit checklist.

To make evaluating the participating agencies easier we have started meeting with the West Sacramento Fire Department and the County Agriculture Department more regularly. We are also working on providing PA access to our scanned facility files. In the last three months we have worked with the City of West Sacramento and the County Agriculture Department on inspection scheduling and making sure that their inspections are properly documented and

forwarded to the CUPA in a timely manner. The Agriculture Department was invaluable in helping the CUPA identify potential hazardous waste generators at farms as part of our effort to remedy deficiency No. 3 (see below). For fiscal year 05/06 the City of West Sacramento Fire Department completed 27 HMBP and 16 hazwaste inspections and the County Agriculture Department completed 42 HMBP and 36 hazwaste inspections. There has been a significant improvement in the numbers of inspections completed and in the quality of the inspection reports, and we will continue to work on improvement. Our goal is to make PA inspections indistinguishable from inspections conducted by the CUPA.

3. **Deficiency:** The CUPA is not inspecting hazardous waste generators at least once every three years (33% of regulated facilities annually). The CUPA has only identified approximately two-thirds of the hazardous waste generators in the County, based upon a comparison of the County's database and the Hazardous Waste Tracking System (HWTs).

CUPA Corrective Action: At the time of the audit Yolo County had identified 567 active hazardous waste generators. HWTs had identified 928 hazardous waste generators in Yolo County, resulting in an annual target of approximately 310 required inspections. Since the audit we have compared the HWTs list of generator facilities with our database and have identified the differences between the two data sources. We hired two new CUPA inspectors (1 replacement, 1 new position) on June 5, 2006, and they have been assigned the task of tracking down hazardous waste generators not currently in our database. To date we have found the following with this project:

Total facilities to research	321
Facilities not in Yolo County	22
Facilities added to our Inventory	72
EPA ID# to Inactivate	33
Facilities out of Business	9
Facilities not generating waste	15
Waiting for a Response from	146

We will continue our efforts to identify hazardous waste generators in Yolo County through this process, the review of business licenses and building permits, and through other types of inspections.

We have added about 100 hazardous waste generators (mostly dentists, medical offices, bicycle shops, and other SQG's) to our database since June 2006, for a current count of 683 hazardous waste generators. Revising my previous estimate, I am expecting that Yolo County actually has about 800 generators and therefore we are planning to inspect 270 hazardous waste generator facilities in FY 2006/2007. The increased staffing in the CUPA program should allow us to meet this goal. Incidentally, we inspected 247 hazardous waste generators in FY 2005/2006, which is very near our target. To ensure that we include any new hazardous waste generators in our inspection program, I have requested that DTSC provide information to Yolo County whenever they issue/activate an EPA Identification number for a generator in our jurisdiction. DTSC is researching a mechanism for providing that information, but I have received no information on their progress. In addition, DTSC has been extremely slow to issue EPA ID numbers to waste generators who have applied for numbers, prompting generators to stockpile waste or resort to shipping on one-time numbers. I would appreciate any clarification or assistance that CalEPA can provide on these issues.

6. **Deficiency:** The Yolo County Area Plan has not been revised since 2001.

CUPA Corrective Action: The CUPA has met with the local fire agencies and a decision has been made to consolidate the various hazmat operations plans in use in the County into one document, the Area Plan. We attended the Area Plan training workshop offered on May 30,

2006, in Hayward, and we intend to include the pesticide drift requirements in our update of the Area Plan. The CUPA has met multiple times with the local fire agencies that are assisting in rewriting the Plan, including most recently on October 5, 2006. We (the CUPA and the fire agencies) have settled on using the Santa Fe Springs FD Area plan as a template and we are still working on drafting the various sections of the plan. I am hoping to start consolidating the pieces of the plan by late December 2006, and have a completed draft by February 2007. It is unlikely that we will have a final, accepted Area Plan by February 2007.

Included as attachments to this audit update are the Draft Table of Contents and Drafts of portions of sections 1-3.

- 7. Deficiency:** The CUPA has not established a procedure necessary to implement a dispute resolution between the CUPA and stationary sources.

This deficiency has been corrected. No further action is required.

- 8. Deficiency:** The CUPA is not inspecting hazardous materials business plan (HMBP) facilities at least once every three years (33% of regulated facilities annually).

CUPA Corrective Action: Yolo County regulated 1052 HMBP facilities in FY 2005/2006 and we inspected 332 of these facilities, approximately 20 inspections fewer than we need to meet our inspection frequencies. We currently regulate 964 HMBP facilities, and we are planning to inspect 325 HMBP facilities in FY 2006/2007. The increased staffing in the CUPA program should allow us to meet this goal. In addition, we are developing queries for our database to ensure not only that we inspect one-third of our HMBP facilities in a given year, but also that we inspect those have gone the longest since last being inspected. We have completed 115 routine inspections thus far since July 1, 2006, and all inspectors including the Agriculture Department and the PA have received updated inspection schedules. We are behind our target of approximately 160 inspections by this time of the year, but we were held up by the move to the new building in late November. With two new inspectors coming on board in January 2007, and with the Agriculture Department conducting inspections (most farms are inspected during the off season in winter) we should have no trouble meeting our inspection goal.

- 9. Deficiency:** The CUPA is not inspecting all CalARP Program stationary sources within their jurisdiction at least once every three years.

CUPA Corrective Action: See reply to Deficiency No. 1 above.

Thank you for giving us the opportunity to update CalEPA on our progress correcting noted deficiencies. If you need additional information, please don't hesitate to contact me.

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